



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENERGY, LABOR & ECONOMIC GROWTH
PUBLIC SERVICE COMMISSION

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September 28, 2009

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Ms. Karen Majcher, Vice-President
High Cost and Low Income Division
Universal Service Administration Company
1000 L. Street, NW, Suite 200
Washington, DC 20036

RE: Section 54.316 of the FCC's Rules: Certification of new rate comparability review for non-rural carriers serving in rural areas for calendar year 2010 support.

Dear Ms. Dortch and Ms. Majcher:

In reviewing the requirements for Michigan to qualify to use the "safe harbor" provision of CC Docket No. 96-45, FCC 03-249, Michigan's statewide average cost for basic local telephone service must fall within two standard deviations of the FCC's national benchmark figure of \$36.52.

The Michigan Public Service Commission submits the required annual 2009 data in order to qualify Michigan Eligible Telecommunications Carriers (ETC) to receive 2010 USF support. Michigan's non-rural ETCs are AT&T Michigan and Verizon. Their current rates for basic local telephone service are:

<u>Company</u>	<u>Monthly Local Rate</u>	<u>Additional Factor</u>	<u>Total Cost</u>
AT&T Michigan	\$14.08	\$8.78	\$ 22.86
Verizon North, Inc.	\$19.15	\$8.78	\$ 27.93
Verizon North Systems	\$19.15	\$8.78	\$ 27.93

Given these rates fall well within the required range of the established benchmark, Michigan again asks to use the safe harbor provision to meet the requirements of certifying for rate comparability.

Please feel free to contact me with any questions. Thank you.

Sincerely,

Robin P. Ancona, Director
Telecommunications Division

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